

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE: TERRORIST ATTACKS ON )  
SEPTEMBER 11, 2001 )  
)

**Civil Action No. 03 MDL 1570 (RCC)**

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This document relates to:

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)  
FEDERAL INSURANCE CO., et al., )  
Plaintiffs, )  
v. )  
AL QAIDA, et al., )  
Defendants. )  
)

**Civil Action No. 03 CV 6978 (RCC)**

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**DECLARATION OF DR. ABDULRAHMAN A. AL-SUWAILEM**

Dr. Abdulrahman A. Al-Suwailem declares as follows:

1. Since 1999, I have served as President of the Saudi Joint Relief Committee and the Saudi Red Crescent Society. I hold a Bachelor of Medicine and Bachelor of Surgery degree from Munich University and a medical degree from Cairo University. Since 1984, I have been a fellow of the Royal College of Physicians in Edinburgh. Prior to my current positions, I served as Deputy Minister for Executive Affairs and the Assistant Deputy Minister for Curative Medicine of the Ministry of Health of the Kingdom of Saudi Arabia, the Head of the Saudi Centre for Organ Transplantation, and the Head of the Pediatric Department at the Maternity and Children's Hospital in Riyadh. I have also served on numerous international health and scientific organizations. A true and accurate copy of my

biography is attached as Exhibit A. I have personal knowledge of, and am competent to testify to, the facts set forth in this Declaration.

2. Beginning with its formation in 1999, the Saudi Joint Relief Committee (the “SJRC”) has always functioned as a political subdivision, agency, or instrumentality of the Kingdom of Saudi Arabia.

3. The SJRC was established on May 19, 1999, pursuant to High Order No. 7/B/1863 (the “Albanian High Order”) issued by HRM King Fahd bin Abdulaziz upon the recommendation of the Council of Ministers of the Kingdom of Saudi Arabia. A true and correct translation of the Albanian High Order is attached as Exhibit B.

4. The purpose of the SJRC was to collect and distribute aid to Albanian refugees in Kosovo on behalf of the Kingdom of Saudi Arabia and its citizens, and to coordinate and document the Kingdom’s charitable assistance through international relief agencies and organizations. The SJRC operated solely as a charitable and humanitarian entity, and none of the funds or other aid distributed by the SJRC was provided for “commercial” purposes.

5. The Kingdom of Saudi Arabia established the SJRC in response to the catastrophic humanitarian crisis triggered by the civil war in the former Republic of Yugoslavia, and the systematic violence against ethnic Albanians in Kosovo orchestrated by former Serbian president Slobodan Milosevic.

6. In 1999, the Kingdom of Saudi Arabia expanded the scope of the SJRC's mission to include relief work for victims of the ongoing hostilities in Chechnya pursuant to a second High Order (No. 7/B/12089) (the "Chechnya High Order"). A true and correct translation of the Chechnya High Order is attached as Exhibit C. Through the Chechnya High Order, the Kingdom of Saudi Arabia intended that the SJRC would act in concert with other international agencies stationed in Chechnya (including the United Nations) to provide humanitarian aid to the hundreds of thousands of Muslims displaced by the war between Chechen fighters and Russia.

7. The Albanian High Order specified that the SJRC would be supervised by the Minister of the Interior of the Kingdom of Saudi Arabia and chaired by the President of the Saudi Red Crescent Society, and further stated that the SJRC must include high-ranking representatives from agencies of the Kingdom, including the Ministry of Finance and National Economy, the Ministry of Defense and Aviation, the Ministry of Information, the Ministry of Labor and Social Affairs, the Ministry of Foreign Affairs, the Presidency of General Intelligence, and the Presidency of National Guard. Pursuant to the Albanian High Order, the SJRC also includes representatives from some non-governmental charitable and humanitarian organizations, including the International Islamic Relief Organization, the World Assembly for Muslim Youth, the Islamic Endowment Foundation, and the Al-Haramain Charitable Foundation.

8. The SJRC submitted regular financial and performance reports to the Minister of the Interior, HRH Prince Nayef Bin Abdulaziz Al-Saud.

9. The SJRC maintained a main office in Riyadh, Saudi Arabia, and branch offices in Vladikavkaz, Pristina, and Moscow. The daily operations of the SJRC's offices were performed by a technical and administrative staff comprised of employees hired directly by the SJRC and civil servants of the Kingdom of Saudi Arabia seconded to work for the SJRC. The Kingdom of Saudi Arabia paid the salaries and expenses for most of the civil servants seconded to work for the SJRC.

10. The Organizational Charter adopted by the SJRC expressly provided that employees seconded from the government would be subject to the laws applicable to government civil servants. Accordingly, seconded government employees of the SJRC are treated as civil servants, rather than private hires, under Saudi law. A true and correct translation of the SJRC Organizational Charter is attached as Exhibit D.

11. The SJRC's mission was largely subsidized by the Kingdom of Saudi Arabia. On March 9, 2000, HRM King Fahd bin Abdulaziz issued a Royal Decree donating 5,000,000 Saudi Riyals to support the SJRC's relief work on behalf of Kosovar students and their families. A true and correct translation of the Royal Decree is attached as Exhibit E. Through the end of 2003, the SJRC received 3,000,000 Saudi Riyals from the Kingdom's initial donation through the Ministry of Finance.

12. In addition, the Kingdom of Saudi Arabia routinely provided critical logistical support for the SJRC's humanitarian efforts in Kosovo and Chechnya.

13. On February 27, 2004, the government of the Kingdom of Saudi Arabia established the Saudi National Committee for Aid and Charitable Work Abroad (the "Saudi National Committee") pursuant to Royal Decree No. A/1. A true and correct translation of Royal Decree No. A/1 is attached as Exhibit F. Royal Decree No. A/1 stated that, once fully functional, the Saudi National Committee will serve as the exclusive agency or instrumentality of the Kingdom of Saudi Arabia responsible for all humanitarian and charitable work abroad.

14. Since the creation of the Saudi National Committee, the SJRC has begun to unwind its operations. The SJRC has significantly reduced its aid and humanitarian relief efforts, and currently operates primarily in an administrative capacity.

15. The SJRC has never solicited charitable or humanitarian donations inside the United States. The SJRC has no offices or employees in the United States, it has no bank accounts or other property in the United States, and it has never conducted any form of business in the United States.

16. The humanitarian mission of the SJRC is fundamentally incompatible with the concept of terrorism, and the SJRC has never had any connection with, or in any way supported, terrorist activities or terrorist organizations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10<sup>th</sup> day of January 2005, in Riyadh, Saudi Arabia.



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Dr. Abdulrahman A. Al-Suwailem